NEST Email Retention Policy

Purpose

To ensure compliance with data protection regulations and reduce the risk of holding unnecessary personal data, this policy sets out the Trust and individual school's approach to retaining and disposing of email communications. Email accounts provided by the Trust or school are intended solely for professional use. They should not be used for personal communication.

Scope

This policy applies to all staff, trustees, local committee members, and contractors using school email systems.

Policy Statement

Retention Period

Emails will be retained for a maximum of 12 months from the date of receipt or creation, unless required for legal, safeguarding, or operational reasons.

Exceptions

Emails containing information relevant to:

- **Safeguarding**
- **Legal proceedings**
- **Financial records**
- **Employment matters**

may be retained longer in accordance with the Trust's broader data retention schedule.

Archiving and Deletion

Emails older than 12 months must be deleted. This includes emails in your inbox, sent box, additional folders and delete box. Staff are responsible for reviewing and archiving important emails before deletion.

Annual Review

The trust will conduct an annual audit of email data to ensure compliance and identify any exceptions.

Secure Disposal

Deleted emails will be permanently removed from all systems and backups in line with secure disposal procedures.

Responsibilities

School leadership and IT administrators are responsible for implementing and monitoring this policy. Staff must ensure they manage their inboxes in accordance with these guidelines.

Legal Basis for Email Retention

This policy is underpinned by the principles set out in Article 5 of the UK General Data Protection Regulation (UK GDPR), particularly the principles of:

- **Storage Limitation** – personal data must be kept no longer than is necessary for the purposes for which it is processed.
- **Data Minimisation** – only data that is adequate, relevant, and limited to what is necessary should be retained.

The retention and deletion of emails are therefore governed by the lawful basis of:

- **Legal Obligation** – where retention is required to comply with statutory duties (e.g. safeguarding, employment law).
- **Public Task** – where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- **Legitimate Interests** – where retention is necessary for the Trust's operational needs, provided it does not override the rights and freedoms of individuals.